**U.S. Department of Justice**

*United States Attorney*
*Southern District of New York*

*The Silvio J. Mollo Building*
*One Saint Andrew's Plaza*
*New York, New York 10007*

November 22, 2016

**BY ECF**

The Honorable Lorna G. Schofield
United States District Judge
40 Foley Square
New York, New York 10007

Re: United States v. Danel Gonzalez, et al., S4 16 Cr. 175 (LGS)

Dear Judge Schofield:

Pursuant to the Court's November 17, 2016 order, the parties[1] write jointly to propose a schedule for discovery, the filing of motions, and dates for a status conference. The Government expects to produce Rule 16 discovery to the defense on a rolling basis, to be completed by December 15, 2016. The parties propose that defense motions be due by February 15, 2017; that Government responses be due by March 1, 2017; and that defense replies be due by March 10, 2017. The parties are available for a status conference on March 27, 28, or 29, 2017.

The Government requests that time under the Speedy Trial Act be excluded from November 22, 2016 through the date of the status conference, pursuant to 18 U.S.C. § 3161(h)(7)(A). The Government submits that the ends of justice are served by this exclusion of time so that the Government may produce discovery, the defense may review discovery and contemplate any motions, and so that the parties may discuss a disposition. Defense counsel consents to the exclusion of time.

Respectfully submitted,

PREET BHARARA
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Southern District of New York

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[1] Defendants Danel Gonzalez and Miguel Ramos have not yet appeared in this District. Accordingly, this letter is on behalf of the Government and defendants Ian Rosso, Raymond Lopez, and Amaury Torres.